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October 17, 2016

Millennium Bulk Terminals NEPA EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

RE: Millennium Bulk Terminals-Longview Proposed Action – Public Comment

To Whom it May Concern:

The Wyoming Mining Association (WMA) is a statewide trade organization that represents and advocates for 37 mining company members producing bentonite, coal, trona and uranium, as well as one company developing a rare earth element mine. WMA also represents 129 associate member companies, two railroads, one electricity co-op, and 180 individual members.

WMA appreciates the opportunity to offer comment on the proposal by Millennium Bulk Terminals-Longview, LLC (Millennium) to create and run a terminal for export of coal in Cowlitz County, Washington.

Wyoming mines produced over 375 million tons of coal last year, and the financial contribution to state and local governments in the form of taxes, royalties and fees was about \$1 billion. In the past two decades, bonus bids from the federal coal leasing program have totaled over \$2.6 billion. This revenue has been dedicated to building schools, supporting community colleges and highways across the state, and keeping the tax burden low on Wyoming citizens. Every county in Wyoming has benefitted from these revenues.

The coal industry is critical to Wyoming. Following a devastating round of layoffs earlier this year, the industry is still employing nearly 6,000 individuals directly with a payroll of nearly \$700 million, and over 2,000 contractors. The average coal mining job pays over \$83 thousand per year, well above the state average. And every coal mining job supports another 2-3 jobs in the service and supply industry.

While the state of Wyoming has traditionally been the primary beneficiary of Powder River Basin coal, export possibilities open the door for more communities to benefit, as well.

Millennium is looking to expand its existing operations by cleaning up the site of an abandoned nearby aluminum smelter and smartly redeveloping it into a port facility to export coal. Millennium expects the local economic benefits of the project will be substantial, generating more than \$102 million in state and local tax revenue over a 30-year period and resulting in more than 2,600 direct and indirect construction jobs, as well as 300 permanent jobs. The port expansion project has received strong support from community leaders, organized labor, agriculture, and state and local business groups such as chambers of

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commerce. The project would revitalize an industrial brownfield site, expand trade capacity, provide jobs, and boost long-term economic growth.

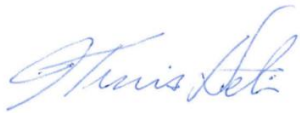
Regretfully, the State of Washington has proposed an unusual and unprecedented condition on the project in order for it to proceed: carbon offsets. As we understand it, the State is requiring Millennium to account for cumulative lifecycle greenhouse gas emissions associated with the project, including by purchasing offset credits for up to 1.3 million tons of carbon dioxide that will be emitted annually in Asia when the exported coal is used for electricity generation. The cost of such offsets could approach \$25 million on the project.

As there appears to be no precedent for such a requirement of studying carbon impact in the lifecycle of a shipped product, it seems the coal industry has been singled out for political reasons. In fact, it is difficult to find a single port facility project that was required to do such an analysis for shipping materials such as cars, airplanes, oil and gas, heavy machinery, medical equipment and computers or agricultural products.

We would certainly hope that public policy makers would judge this project on the merits and benefits rather than politics.

Thank you for your consideration of these comments.

Sincerely,



Travis Deti
Executive Director